

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION

In re: Ronald D. & Tawanda R. Johnson  
Debtors.

Case #: 3:10-bk-37293-DOT  
Chapter 13 AP

**NOTICE OF APPLICATION FOR SUPPLEMENTAL FEE APPLICATION**

**Mitchell P. Goldstein, Esq.**, counsel for the Debtors, has filed a Supplemental Fee Application for Allowance of Compensation.

**YOUR RIGHTS MAY BE AFFECTED.** You should read these papers carefully, and discuss them with your attorney in this Bankruptcy Case, if you have one. (If you do not have an attorney, you may wish to consult one.)

If you do not want the court to grant the relief sought in the motion, or if you want the court to consider your views on the motion, then on or before June 29, 2011, you or your attorney must:

**File with the court**, at the address shown below, a written response, pursuant to Local Bankruptcy Rule 9013-1(H). If you mail your response, to the court for filing, you must mail it early enough so the court will receive it on or before the date stated above.

Clerk US Bankruptcy Court  
701 E. Broad St., Suite 4000  
Richmond, VA 23219

And also:  
Mitchell P. Goldstein, Esq.  
9962 Brook Road, #647  
Glen Allen, VA 23059

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion, and may enter an order granting that relief.

DATE: June 15, 2011

/s/Mitchell P. Goldstein  
Mitchell P. Goldstein, Esq. VSBN 40613  
mitch@mitchellpgoldstein.com  
Goldstein Law Group  
9962 Brook Road, #647  
Glen Allen, VA 23059  
(804) 592-1674

**CERTIFICATE OF SERVICE**

I certify that I have transmitted a true copy of the foregoing application electronically through the Court's CM/ECF system or by mail to the Debtor(s), Chapter 13 trustee, the United States trustee if other than by the electronic means provided for at Local Bankruptcy Rule 2002-1(d)(3), and to all parties in interest.

/s/ Mitchell P. Goldstein  
Mitchell P. Goldstein, Esq.

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**APPLICATION FOR SUPPLEMENTAL COMPENSATION  
OF ATTORNEY FOR DEBTORS**

Mitchell P. Goldstein, Esq. applies for approval and payment of supplemental compensation (including reimbursement of expenses) as attorney for the debtor in the amount of \$500.00.

1. The period covered by this application is from March 8, 2011 through May 11, 2011.
2. **Nature and charge for services billed in the original fee.** Fees in the amount of \$3,000 have previously been paid by debtors or approved for payment through the plan.
3. **Nature and charge for services billed as supplemental fee.** Supplemental fees were incurred in defense of a Motion for Relief, which is not a routine service provided for in the initial fee. Mitchell Goldstein contested a Motion for Relief as requested by the clients. The Motion for Relief was filed by the mortgage lender alleging unpaid mortgage payments.
4. **Why supplemental services were necessary.** The supplemental services were requested by the client and necessary to save the house. Had relief been granted, the Chapter 13 would have failed and the lender would have been able to proceed to foreclosure.
5. The attorneys and paralegals who provided the services for which supplemental compensation is requested are as follows:

Name	Position	Years in Practice	Hourly Rate	Hours	Total Fees
Mitchell P. Goldstein	Attorney	14	\$300.00	See Below	

6. A summary of the services for which supplemental compensation is requested is as follows:

Description of Services Rendered	Attorney Hours	Dates of Service	Total Fees
Contested a Motion for Relief	See Standing Order No. 08-1	March 8 – May 11, 2011	\$500.00

7. The costs requested in this application are as follows: N/A.
8. Charges have not (have/have not) been included for preparation and noticing of the fee application and any court appearances related to the application.

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9. The requested fee can (can/cannot) be paid through the Chapter 13 plan without reducing the dividend on unsecured claims.

10. This application is submitted without waiving the right to request, at some point during the pendency of this case, approval of expenses incurred in the preparation and noticing of this fee application, charges that are not included herein.

I ask for this:

/s/ Mitchell P. Goldstein  
Mitchell P. Goldstein, Esq. VSBN 40613  
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**Certificate of Service**

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/s/ Mitchell P. Goldstein

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